

# EXHIBIT 118

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Erin E. Driver-Linn  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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STUDENTS FOR FAIR ADMISSIONS, INC.,  
Plaintiff

vs. CA NO. 1:14-CV-14176  
PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE  
(HARVARD CORPORATION),

Defendant

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

DEPOSITION OF: ERIN E. DRIVER-LINN

WILMERHALE

60 State Street

Boston, Massachusetts

July 27, 2017 9:03 a.m.

Darlene M. Coppola

Registered Merit Reporter

Certified Realtime Reporter

Job no. 127103

1 Erin E. Driver-Linn

2 BY MR. STRAWBRIDGE:

3 Q. Did you review that report to  
4 prepare for this deposition?

5 MS. ELLSWORTH: Objection.

6 A. I reviewed that work product to  
7 prepare.

8 BY MR. STRAWBRIDGE:

9 Q. What is the distinction you're  
10 making in your mind between "report" and  
11 "work product"?

12 A. A report is more formal.

13 Q. And what is formal about this work  
14 product?

15 MS. ELLSWORTH: Objection.

16 A. Work that the office of  
17 institutional research does is iterative  
18 and goes back and forth between internal  
19 members of the team.

20 When it's in a PowerPoint format, it  
21 does not mean it's formal.

22 BY MR. STRAWBRIDGE:

23 Q. What in your mind makes a report  
24 formal?

25 A. Various things.

1 Erin E. Driver-Linn

2 Harvard use any outside entity to provide  
3 statistical information?

4 MS. ELLSWORTH: Objection.

5 A. I don't know.

6 BY MR. STRAWBRIDGE:

7 Q. Do you remember any experience where  
8 a consultant was hired to double-check  
9 OIR's work?

10 MS. ELLSWORTH: Objection.

11 A. No.

12 BY MR. STRAWBRIDGE:

13 Q. OIR is the party that's responsible  
14 at the college for preparing that  
15 information and accurately and conveying it  
16 to these various entities?

17 MS. ELLSWORTH: Objection.

18 A. No.

19 BY MR. STRAWBRIDGE:

20 Q. Who is?

21 A. The office of institutional research  
22 is, at the university level.

23 There's another office, the Harvard  
24 College office of institutional research.

25 Q. And which of the various groups that

Erin E. Driver-Linn

A. A doctoral degree in social psychology, experience working on various kinds of research projects.

BY MR. STRAWBRIDGE:

Q. What was your undergraduate degree in?

A. Communications.

Q. Where did you earn that from?

A. University of Arkansas.

Q. Do you have a master's degree?

A. They give you a master's degree on the way to the doctoral degree.

Q. Is it also in -- I'm sorry. Was it at -- in social psychology?

A. Uh-huh.

Q. So you have a master's and a doctorate in social psychology?

MS. ELLSWORTH: Objection.

BY MR. STRAWBRIDGE:

Q. Or does the doctorate trump the master's?

A. It does.

Q. Did you have experience with statistical analysis before you became

1 Erin E. Driver-Linn

2 director of institutional research?

3 MS. ELLSWORTH: Objection.

4 A. Yes.

5 BY MR. STRAWBRIDGE:

6 Q. And what was your experience?

7 A. I took classes in methods, and I  
8 analyzed data from psychology experiments.

9 Q. And was that the only statistical  
10 training or experience that you had?

11 MS. ELLSWORTH: Objection.

12 A. Classes, experience; yes.

13 BY MR. STRAWBRIDGE:

14 Q. How many years of experience do you  
15 think you had in statistical analysis?

16 A. Ten-ish.

17 Q. Is an advanced degree in statistics  
18 a requirement of working in the office of  
19 institutional research?

20 MS. ELLSWORTH: Objection.

21 A. Not to my knowledge.

22 BY MR. STRAWBRIDGE:

23 Q. Are the people who work in the  
24 office of institutional research expected  
25 to have some familiarity or experience with

1 Erin E. Driver-Linn

2 respect to statistical analysis?

3 MS. ELLSWORTH: Objection.

4 A. Not all of them.

5 BY MR. STRAWBRIDGE:

6 Q. Some of them?

7 MS. ELLSWORTH: Objection.

8 A. Yes.

9 BY MR. STRAWBRIDGE:

10 Q. It's a big part of the office's  
11 overall responsibility, correct?

12 MS. ELLSWORTH: Objection.

13 A. What do you mean by "big part"?

14 BY MR. STRAWBRIDGE:

15 Q. Does the office of institutional  
16 research handle a lot of data for the  
17 university?

18 A. What do you mean by "a lot"?

19 Q. In your view, I believe you said  
20 that the office of institutional research  
21 had the responsibility for collecting,  
22 summarizing and reporting institutional  
23 data, correct?

24 MS. ELLSWORTH: Objection.

25 A. Correct.

1 Erin E. Driver-Linn  
2 to look into the IPEDS statistics to see  
3 whether or not the claims made in Ron Unz's  
4 article were accurate --

5 MS. ELLSWORTH: Objection.

6 Q. -- in early 2013?

7 MS. ELLSWORTH: My apologies.  
8 Objection.

9 A. I'm sorry. Could you repeat the  
10 question?

11 MR. STRAWBRIDGE: Go ahead.

12

13 \*(Question read.)

14

15 A. No.

16 BY MR. STRAWBRIDGE:

17 Q. \*What, if anything, do you recall  
18 doing in response to Ron Unz's article at  
19 OIR?

20 MS. ELLSWORTH: Objection.

21 Again, I'll remind the witness not  
22 to disclose the content of communications  
23 with counsel or actions taken at the  
24 direction of counsel in answering the  
25 question.



1 Erin E. Driver-Linn

2 A. I'm sorry. Could you repeat the  
3 question?

4 MR. STRAWBRIDGE: Go ahead.

5

6 \*(Question read.)

7

8 A. I can't answer that question.

9 BY MR. STRAWBRIDGE:

10 Q. Why can't you answer that question?

11 A. Because it relates to discussions  
12 with counsel.

13 Q. Is it your testimony that everything  
14 that OIR did in response to Ron Unz's  
15 article in 2013 was done at the direction  
16 or upon the advice of counsel?

17 MS. ELLSWORTH: Objection.

18 A. No.

19 BY MR. STRAWBRIDGE:

20 Q. Okay. So what did you do that  
21 wasn't done at the direction of counsel?

22 MS. ELLSWORTH: Objection.

23 A. Could you clarify "do"?

24 BY MR. STRAWBRIDGE:

25 Q. No. I'm sorry, I can't.

1 Erin E. Driver-Linn

2 "Do" means to take action.

3 Like, what did OIR do with -- in  
4 response to Ron Unz's article that wasn't  
5 at the direction of counsel?

6 MS. ELLSWORTH: Objection.

7 Just answer the question as best you  
8 can if he won't clarify it.

9 A. I can't remember what was done at  
10 the direction of counsel and what was not  
11 exactly.

12 BY MR. STRAWBRIDGE:

13 Q. When you prepared for this  
14 deposition, did you discuss what OIR --  
15 what actions OIR took in response to the  
16 Ron Unz article?

17 MS. ELLSWORTH: Objection.

18 I will direct the witness not to  
19 answer that question.

20 BY MR. STRAWBRIDGE:

21 Q. Are you going to follow that  
22 advice?

23 A. I am.

24 Q. As part of your preparation for this  
25 article, did you review what actions OIR

1 Erin E. Driver-Linn

2 BY MR. STRAWBRIDGE:

3 Q. Are you aware of OIR, in 2013,  
4 constructing a logistic model to analyze  
5 the way the admissions process works?

6 MS. ELLSWORTH: Objection.

7 A. I'm aware in preparation for this  
8 deposition that this model was done.

9 BY MR. STRAWBRIDGE:

10 Q. And who constructed this model?

11 A. I don't know. My best guess is Mark  
12 Hansen.

13 Q. And why is that your best guess?

14 A. My sense is at the time Mark was  
15 trying to learn about different forms of  
16 modeling.

17 Q. And was he trying to -- why was Mr.  
18 Hansen modeling admissions criteria?

19 MS. ELLSWORTH: Objection.

20 A. In the course of doing his work.

21 BY MR. STRAWBRIDGE:

22 Q. Do you think this was the first time  
23 he had ever done a logistic model?

24 A. I don't think it was the first time  
25 for any logistic model. It may have been

1 Erin E. Driver-Linn  
2 the first time to do an Unz -- to look at  
3 at odds ratios.

4 Q. Why do you think that?

5 A. My memory of Mark is he had a  
6 mathematics background but did not have  
7 much of a statistics background.

8 Q. Can you say with any certainty  
9 whether this is the first time he had ever  
10 done an odds ratio?

11 MS. ELLSWORTH: Objection.

12 A. I cannot.

13 BY MR. STRAWBRIDGE:

14 Q. Do you -- are you aware of any --  
15 are you aware of any analytical errors that  
16 are reflected in this chart?

17 A. Yes.

18 Q. What's that analytical error?

19 A. From my perspective, a model should  
20 not be constructed with these kinds of  
21 variables put together.

22 Q. Why?

23 A. One example is that it mixes  
24 categorical variables with continuous  
25 variables.

1 Erin E. Driver-Linn

2 individuals in OIR?

3 Q. Why was this something that OIR was  
4 spending their time doing?

5 MS. ELLSWORTH: Objection.

6 A. I don't know exactly.

7 BY MR. STRAWBRIDGE:

8 Q. Do you know generally?

9 A. Generally, I believe it was to try  
10 to approximate and understand the  
11 independent variables that were used in  
12 admissions decision-making.

13 Q. And why was OIR trying to  
14 approximate and understand those variables?

15 MS. ELLSWORTH: Objection.

16 A. It's part of ongoing work related to  
17 admissions and financial aid.

18 BY MR. STRAWBRIDGE:

19 Q. And ongoing work at whose request?

20 MS. ELLSWORTH: Objection.

21 A. There's another work product that  
22 includes this model that has multiple  
23 categories of work, and the answer to the  
24 question is different depending on the  
25 different categories of work.

Erin E. Driver-Linn

BY MR. STRAWBRIDGE:

Q. I'm talking about this category of work.

A. This particular model, I do not believe we were asked to work on.

Q. You think this was just something that you did on your own?

A. I do.

Q. Why do you think it's something you did on your own?

A. My best understanding is that Mark, in particular, and others on the team wanted to be able to understand whether admissions could be quantified.

Q. You think this was just a hobby inquiry?

MS. ELLSWORTH: Objection.

A. That's not how I would characterize it.

BY MR. STRAWBRIDGE:

Q. Earlier you told me that some of this work was being done to respond to concerns that were raised in the popular press, including Ron Unz's article. Right?

1 Erin E. Driver-Linn

2 A. I don't believe that's exactly the  
3 way I said it.

4 I believe one reason why OIR was  
5 doing work on admissions and financial aid  
6 at this period of time was because of  
7 questions that were raised in the popular  
8 press, including Ron Unz's article.

9 Q. Did you review Mark Hansen's  
10 deposition testimony about the creation of  
11 this document?

12 A. Yes.

13 Q. As part of your preparation for this  
14 deposition?

15 A. Yes.

16 Q. Do you have any reason to believe  
17 that his testimony was inaccurate with  
18 respect to why he was creating this  
19 document?

20 A. Not the same as my memory.

21 Q. Do you think that he's mistaken?

22 A. I think he might be mistaken.

23 Q. Are you saying under oath that you  
24 think he got this wrong?

25 MS. ELLSWORTH: Objection.

1 Erin E. Driver-Linn

2 A. I would not say he got this wrong.  
3 My best recollection is that Mark worked on  
4 this and brought it forward after he had  
5 been working on it to others in the team.

6 BY MR. STRAWBRIDGE:

7 Q. So is it your testimony under oath  
8 that this document was created entirely at  
9 the instigation of people within OIR with  
10 no questions or input from anyone outside  
11 the office of institutional research?

12 MS. ELLSWORTH: Objection.

13 A. It's my best understanding that no  
14 person outside of OIR asked us to do this  
15 modeling work.

16 BY MR. STRAWBRIDGE:

17 Q. And are you positive that's true?

18 MS. ELLSWORTH: Objection.

19 A. I can't be perfectly certain.

20 BY MR. STRAWBRIDGE:

21 Q. Are you certain -- can you say with  
22 any certainty under oath today that this  
23 model and work was not being done because  
24 of questions from somebody outside of the  
25 office of institutional research about



Erin E. Driver-Linn

Q. And what discussions are you referring to in particular?

MS. ELLSWORTH: Objection.

I'll remind the witness not to disclose the contents of any communications with counsel or actions taken at the direction of counsel in answering the question.

A. I'm sorry. Could you repeat the question?

BY MR. STRAWBRIDGE:

Q. What discussions are you referring to, the Unz discussions?

A. I can't answer that question.

Q. Based on the instruction that your attorney gave you?

A. Yes.

Q. The instruction was not to refer to the content of the discussions.

But is it your testimony that the discussions that are referred to here are discussions where counsel for Harvard was present?

MS. ELLSWORTH: Objection.

1 Erin E. Driver-Linn

2 A. I'm sorry. Could you repeat the  
3 question?

4 BY MR. STRAWBRIDGE:

5 Q. Are the Unz discussions that you're  
6 referring to here discussions where a  
7 lawyer for Harvard was present?

8 A. That's my best recollection.

9 Q. Are you aware of any discussions  
10 that took place regarding the Ron Unz  
11 article with Dean Fitzsimmons or Sally  
12 Donahue where counsel was not present?

13 A. I don't recall.

14 Q. You don't know whether there were  
15 such discussions or not?

16 MS. ELLSWORTH: Objection.

17 A. I don't know.

18 BY MR. STRAWBRIDGE:

19 Q. Your next sentence says, you think  
20 "It would be helpful to find a time to  
21 review with you the threads of the work we  
22 are doing to ensure that we are aligned."

23 Did I read that correctly?

24 A. You did.

25 Q. What did you mean by "ensure that we

1 Erin E. Driver-Linn

2 includes analysis as to whether or not  
3 there is bias in the admissions process  
4 against Asian-Americans at Harvard?

5 MS. ELLSWORTH: Objection.

6 A. I'm sorry. Could you repeat the  
7 question?

8 BY MR. STRAWBRIDGE:

9 Q. Do you agree that that -- that this  
10 report, particularly on page -- on the  
11 pages that you just looked at, 30 to 39,  
12 includes analysis as to whether there is  
13 bias against Asians in college admissions  
14 at Harvard?

15 MS. ELLSWORTH: Objection.

16 A. No.

17 BY MR. STRAWBRIDGE:

18 Q. Let me direct you to Page 3 of this  
19 report.

20 Have you had a chance to look at  
21 this page?

22 A. Yes.

23 Q. So this is a slide entitled "Recent  
24 Admissions in Financial Aid, Questions  
25 Raised."

1 Erin E. Driver-Linn

2 Correct?

3 A. Correct.

4 Q. Question No. 3 on here is "Is there  
5 bias against Asians in college admissions?"

6 A. Correct.

7 Q. And that's the part of the report  
8 that's referring to the analysis that takes  
9 place on Pages 30 through 39, correct?

10 A. I do believe that Question 3 on Page  
11 3 is the same work that is later referenced  
12 as evaluating factors that play a role in  
13 Harvard College admission.

14 Q. You agree that it's referring to  
15 Pages 30 to 39 of this document?

16 MS. ELLSWORTH: Objection.

17 A. I would say referring to 30 to 36.

18 BY MR. STRAWBRIDGE:

19 Q. Fair to -- go ahead.

20 A. (Witness reviews document.)

21 And 38 -- 38 also references, I  
22 think, that.

23 Q. Do you remember reviewing this  
24 document when it was sent around by  
25 Miss Bever?

1 Erin E. Driver-Linn

2 Q. So you -- so Harvard's testimony,  
3 through you as their 30(b)(6) witness, is  
4 that you do not know what type of report --  
5 which version of this report was shared  
6 with Dean Fitzsimmons?

7 MS. ELLSWORTH: Objection.

8 A. It's my best understanding from  
9 reading the materials that there was a  
10 meeting and there was a version of this  
11 work, but I don't know what version.

12 BY MR. STRAWBRIDGE:

13 Q. Do you have any basis to believe  
14 that the version that was presented at the  
15 meeting with Dean Fitzsimmons is different  
16 than this one?

17 MS. ELLSWORTH: Objection.

18 Which exhibit are you referring to  
19 when you say "this one"?

20 MR. STRAWBRIDGE: Exhibit 8.

21 A. (Witness reviews document.)

22 I don't have any reason to -- I  
23 don't know.

24 BY MR. STRAWBRIDGE:

25 Q. What do you remember about the

1 Erin E. Driver-Linn  
2 meeting with Dean Fitzsimmons on  
3 February 25th?

4 MS. ELLSWORTH: Objection.

5 A. In preparation for today and looking  
6 at these documents and trying to think back  
7 and jog my memory, I have a vague memory of  
8 my reactions to Dean Fitzsimmons seeing  
9 this work.

10 BY MR. STRAWBRIDGE:

11 Q. What were your reactions to him  
12 seeing this work?

13 A. I remembered wondering to myself if  
14 the team had gone too far.

15 Q. And why do you think that?

16 A. Why do I recall that? Why do I  
17 think that? What --

18 Q. Why did you have a reaction thinking  
19 the team had gone too far?

20 MS. ELLSWORTH: Objection.

21 A. Reconstructing my memory now, my  
22 best understanding of that vague sense was  
23 that I had enormous respect for Dean  
24 Fitzsimmons and the -- to try to quantify  
25 what's a very complicated set of things, I

1 Erin E. Driver-Linn

2 felt like it might have gone too far.

3 BY MR. STRAWBRIDGE:

4 Q. And what do you mean by "gone too  
5 far"?

6 A. Being reductive, trying to take  
7 complex things and reduce them to overly  
8 simplistic.

9 Q. Did you decide -- well, strike that.  
10 Why did you have this reaction?

11 MS. ELLSWORTH: Objection.

12 A. I don't know. It's a vague memory.

13 BY MR. STRAWBRIDGE:

14 Q. Do you remember Dean Fitzsimmons  
15 saying something in particular about  
16 Pages 30 through 39 of this report?

17 A. I don't.

18 Q. Do you remember feeling like the  
19 suggestion that Asian -- that the  
20 admissions process disadvantages  
21 Asian-Americans was troubling to him?

22 MS. ELLSWORTH: Objection.

23 A. Could you repeat the question?

24 BY MR. STRAWBRIDGE:

25 Q. Do you remember whether he had a

1 Erin E. Driver-Linn  
2 reaction that suggested that Pages 30 to 39  
3 of this report presented information that  
4 was troubling to him?

5 MS. ELLSWORTH: Objection.

6 A. I do not.

7 BY MR. STRAWBRIDGE:

8 Q. Do you remember him disagreeing with  
9 the analysis that appears on Pages 30 to  
10 39?

11 MS. ELLSWORTH: Objection.

12 A. I do not.

13 BY MR. STRAWBRIDGE:

14 Q. Do you remember him saying, we  
15 should look into this further?

16 A. I do not.

17 Q. Or anything like that at all?

18 MS. ELLSWORTH: Objection.

19 A. I do not.

20 BY MR. STRAWBRIDGE:

21 Q. Do you remember him having any  
22 visible reaction to the information that  
23 appears on Pages 30 to 39 of this version  
24 of the report?

25 MS. ELLSWORTH: Objection.



1 Erin E. Driver-Linn

2 A. My vague memory is only that he was  
3 more thoughtful.

4 BY MR. STRAWBRIDGE:

5 Q. What does that mean?

6 A. Pausing and reflecting.

7 Q. And that's --

8 A. Not verbally.

9 My vague memory is of a pause and  
10 then my thinking to myself, has the team  
11 gone too far, have I gone too far, has the  
12 team gone too far.

13 Q. Do you think you were presenting  
14 information that Dean Fitzsimmons didn't  
15 want to know?

16 MS. ELLSWORTH: Objection.

17 A. That is not my sense.

18 BY MR. STRAWBRIDGE:

19 Q. Then why did you think you had gone  
20 too far?

21 A. Reducing what's a very complicated  
22 thing into, you know, a quant model.

23 Q. Isn't that what the office of  
24 institutional research does?

25 MS. ELLSWORTH: Objection.

1 Erin E. Driver-Linn

2 A. It's not how I would characterize  
3 what the office of institutional research  
4 does.

5 I am referencing, again, my earlier  
6 point about exploratory, preliminary,  
7 limited.

8 I believe all complicated analyses  
9 are iterative, exploratory, preliminary,  
10 and limited.

11 BY MR. STRAWBRIDGE:

12 Q. Did you have that concern about your  
13 analysis of the results of the  
14 reintroduction of early action that was  
15 presented as part of the same report?

16 A. I don't know.

17 Q. Did you feel like that part was too  
18 reductive and you had overly simplified a  
19 complicated process?

20 MS. ELLSWORTH: Objection.

21 A. I just want to clarify that I don't  
22 have specific memories of what I thought  
23 then. This is a vague -- a vague memory.

24 I don't remember having a memory  
25 related to the return of the early action

1 Erin E. Driver-Linn  
2 page -- well, strike that -- with respect  
3 to the charts that appear on Page 40  
4 through 41 of this report?

5 A. Not that I recall.

6 Q. In your vague and hazy recollection  
7 of your internal dialogue, are you sure  
8 that you had that feeling with respect to  
9 Pages 30 through 39 and that analysis and  
10 not other parts of this report?

11 MS. ELLSWORTH: Objection.

12 A. No.

13 BY MR. STRAWBRIDGE:

14 Q. So it's possible that you didn't  
15 have that reaction with respect to the  
16 analysis of bias against Asian-Americans in  
17 the admissions process?

18 MS. ELLSWORTH: Objection.

19 A. That's not how I would characterize  
20 the modeling work --

21 BY MR. STRAWBRIDGE:

22 Q. You agree that that's how it's  
23 characterized on --

24 MS. ELLSWORTH: Can you let  
25 the witness finish her answer, please.

1 Erin E. Driver-Linn

2 A. I think I was aware at that time  
3 that further work was being done.

4 BY MR. STRAWBRIDGE:

5 Q. Do you know whether that included  
6 further work on modeling the factors that  
7 influence admissions decisions at  
8 Harvard?

9 MS. ELLSWORTH: Objection.

10 A. I can't recall.

11 BY MR. STRAWBRIDGE:

12 Q. And do you remember any discussion  
13 at all following the February 25th meeting  
14 about what the next steps should be with  
15 respect to the work that had gone into  
16 Pages 30 to 39 of that presentation?

17 MS. ELLSWORTH: Objection.

18 A. The question -- the question was,  
19 can I recall any discussion of next steps?

20 BY MR. STRAWBRIDGE:

21 Q. Right.

22 A. No, I can't recall.

23 Q. Do you know if there was discussion  
24 as to whether that information should be  
25 presented to Michael Smith, for example?

1 Erin E. Driver-Linn

2 A. Not that I recall.

3 Q. Do you recall if there was any  
4 discussion about whether it should be  
5 presented to Dean Hammonds?

6 A. Not that I recall.

7 Q. Can you say whether or not there was  
8 any discussion about further work to  
9 analyze the extent to which Asian-Americans  
10 were affected by Harvard's admissions  
11 process?

12 MS. ELLSWORTH: Objection.

13 I'll remind the witness not to  
14 disclose any actions taken at the direction  
15 of counsel or communications with counsel.

16 You may otherwise answer the  
17 question.

18 A. Can you repeat the question?

19 BY MR. STRAWBRIDGE:

20 Q. Do you remember, following that  
21 February 25th meeting, any discussion about  
22 further steps to be taken in analyzing  
23 whether Asian-Americans were disadvantaged  
24 by Harvard's admissions process?

25 A. I can't answer that question.

1 Erin E. Driver-Linn

2 BY MR. STRAWBRIDGE:

3 Q. Can you answer -- is that because  
4 your answer requires you to reveal  
5 communications with counsel?

6 A. Yes.

7 Q. Did you have any such discussions  
8 that did not include communications with  
9 counsel?

10 A. Not that I recall.

11 Q. When are the discussions you're  
12 thinking of? When did they take place?

13 MS. ELLSWORTH: Objection.  
14 It's a when question. You can answer it as  
15 a when.

16 A. I believe prior to October 2013 and  
17 then much later.

18 BY MR. STRAWBRIDGE:

19 Q. Did -- he when you say "much later,"  
20 what do you mean?

21 A. Maybe in 2015.

22 Q. After this lawsuit was filed?

23 MS. ELLSWORTH: Objection.  
24 Answer if you know.

25 A. I believe so.

1 Erin E. Driver-Linn  
2 that memo before -- as it was being  
3 created?

4 A. I don't have a specific memory of  
5 reviewing drafts, but I believe, in  
6 preparation for today, that I did review...

7 Q. Was there any guidance in the office  
8 as to who should take responsibility for  
9 admissions issues among the OIR team?

10 MS. ELLSWORTH: Objection.

11 A. What do you mean by "guidance"?

12 BY MR. STRAWBRIDGE:

13 Q. Is there any reason why this -- both  
14 the February analysis and the May analysis  
15 was done by Mr. Hansen and Miss Bever  
16 as opposed to other people in the office?

17 A. In general, there's efficiency in  
18 having people work in the same area,  
19 because it's -- it takes a while to learn  
20 the data, it takes a while to understand  
21 what's going on.

22 Q. And so, in your experience around  
23 2013, 2014, was admissions analysis the  
24 responsibility of Miss Bever and  
25 Mr. Hansen?

1 Erin E. Driver-Linn

2 MS. ELLSWORTH: Objection.

3 A. I wouldn't characterize it as the  
4 responsibility of.

5 BY MR. STRAWBRIDGE:

6 Q. Do you recall anybody else working  
7 on admissions analysis in the OIR office at  
8 that time?

9 A. I don't recall. I know in  
10 preparation for today that someone  
11 mentioned Alisa Lu may be being involved.

12 I think I'm remembering that  
13 correctly.

14 Q. And who is Miss Lu?

15 A. She was a member of the OIR team.

16 Q. And do you know who she reported to?

17 A. I think she reported to Erica.

18 Q. Do you know what she did, what  
19 you're recalling?

20 MS. ELLSWORTH: Objection.

21 A. I don't.

22 BY MR. STRAWBRIDGE:

23 Q. I'm handing you a document that's  
24 been labeled as Exhibit 13.

25



HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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Erin E. Driver-Linn

## CERTIFICATION

I, DARLENE M. COPPOLA, a Notary Public, do hereby certify that ERIN E. DRIVER-LINN, after having satisfactorily identifying herself, came before me on the 27th day of July, 2017, in Boston, Massachusetts, and was by me duly sworn to testify to the truth and nothing but the truth as to her knowledge touching and concerning the matters in controversy in this cause; that she was thereupon examined upon her oath and said examination reduced to writing by me; and that the statement is a true record of the testimony given by the witness, to the best of my knowledge and ability.

I further certify that I am not a relative or employee of counsel/attorney for any of the parties, nor a relative or employee of such parties, nor am I financially interested in the outcome of the action.

WITNESS MY HAND THIS 9th day of August, 2017.

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DARLENE M. COPPOLA

My commission expires:

NOTARY PUBLIC

November 11, 2022

REGISTERED MERIT REPORTER

CERTIFIED REALTIME REPORTER